

Jason A. Copley
Managing Partner



United Plaza, 19th Floor
30 South 17th Street
Philadelphia, PA 19103
T: 215.564.1700 | F: 267.238.4407
jcopley@cohenseglias.com
www.cohenseglias.com

October 9, 2014

VIA FACSIMILE (609) 989-0463

The Honorable Michael A. Shipp
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

**Re: E. Allen Reeves, Inc. v. Michael Graves & Associates, Inc.
USDC of New Jersey; Civil Action No.: 3:10-cv-01393**

Dear Judge Shipp:

As your honor knows, this firm represents E. Allen Reeves and the Arts Council of Princeton with respect to the above matter. Immediately following yesterday's Pre-trial Conference, I advised our party witnesses of the new January 6, 2015 trial date. I was advised that Reeves' Project Manager for the Arts Council Project, Al Haibach is unavailable for the new trial date. Mr. Haibach is the single most important witness for Reeves in this case. Also, Ken Robertson who negotiated the contract and had significant involvement with the Project is traveling and unavailable. Finally, Sal Arnone is away and unavailable for the new trial date. Mr. Arnone is a very important witness for Arts Council as he was the owner's representative during the planning and construction of the Project. Unfortunately, due to the unavailability of these witnesses Reeves and ACP will be severely prejudiced by this new trial date.

Reeves and ACP have no choice but to request that we revert back to the November 13, 2014 trial date. Reeves and ACP respectfully request that the court hold a telephone conference at your honor's earliest convenience to discuss the trial date.

Respectfully submitted

A handwritten signature in blue ink, appearing to read "JASON A. COBLEY".

JASON A. COBLEY

cc: Raymond J. Michaud, Esquire (via email – RJMichaud@MDWCG.com)